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**REMOVAL ACTION 15 SCRAP METAL PILES, PHASE IIB SCRAP
COPPER, WORK PLAN MILESTONES**

03/06/95

**DOE-0663-95
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LETTER**



Department of Energy
Fernald Environmental Management Project
P. O. Box 398705
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MAR 6 1995

DOE-0663-95

Mr. James A. Saric, Remedial Project Director
U.S. Environmental Protection Agency
Region V - 5HRE-8J
77 W. Jackson Boulevard
Chicago, Illinois 60604-3590

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

REMOVAL ACTION NUMBER 15 SCRAP METAL PILES, PHASE IIB SCRAP COPPER, WORK PLAN MILESTONES

Reference: Letter, Jack R. Craig, DOE, to James Saric, U.S. EPA, and Tom Schneider, Ohio EPA, "Removal Action No. 15, Phase IIB Scrap Copper, Work Plan Milestones," dated July 27, 1994

This letter provides an update to the Removal Action Number 15, Scrap Copper Pile Phase IIB Work Plan milestones. Submittal of the Removal Action Project Plan (RAPP) in September 1993 and the Final Report in March 1995, as specified in the referenced letter, will be delayed in order to conduct a treatability/engineering study. The initially proposed process was too costly with respect to the market value of the material being recycled.

In July 1994, a more cost effective method to process the copper was submitted by the proposed vendor, which included a treatability/engineering study. The Department of Energy (DOE) chose not to award the contract since treatability/engineering work is necessary prior to selecting disposition options. In September 1994, funding was requested and approved to conduct a treatability/engineering study.

The purpose of the study is to determine reasonable costs for decontamination and unrestricted release versus disposal of the material either on or off-site. The study focuses on proposals which result in decontamination leading to recycling. The treatability/engineering study will be performed on 30 tons of copper to demonstrate that the materials can be recycled. The DOE will submit the results of the treatability/engineering study upon completion. The study is scheduled to be completed in mid 1996 and will include the



Recycled and Recyclable



following:

1. Removal of asbestos insulation from the copper.
2. Removal of lead brazed joints.
3. Determining whether the copper can be released for unrestricted use after removal of the asbestos. Most of the radioactive contamination may be in the asbestos insulation.
4. Determining whether the copper requires decontamination prior to unrestricted release.
5. Determining disposal options for the friable asbestos insulation. Although the Nevada Test Site (NTS) cannot accept friable asbestos, Envirocare and the Fernald Environmental Management Project (FEMP) proposed cell are options.

After review of the treatability/engineering study, a preferred option for the scrap copper will be chosen from the following:

1. Process for unrestricted release and transport the secondary waste streams to a disposal facility.
2. Process and reuse for DOE projects, such as copper block shielding.
3. Disposition to off-site Disposal Facility, after any required processing.
4. Potential disposition to the FEMP disposal cell without processing (pending Operable Unit 3 (OU3) Record of Decision (ROD)).

Until the treatability/engineering study is complete and a decision is made on the preferred disposition, no meaningful schedule can be presented. It is therefore requested that the milestones on this Removal Action be deferred until completion of the study, and formal selection of a disposal option.

Presently, the copper is safely stored in weather-tight metal boxes and is not a threat to human health or the environment. The containers are inspected on a regular basis under Removal Action 9 - Removal of Waste Inventories.

If you or your staff have any questions, please contact Donald A. Pfister at (513) 648-3170.

Sincerely,

Johnny Reising

for

Jack R. Craig
Fernald Remedial Action
Project Manager

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cc:

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